

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Allocation of the 219-220 MHz )  
Band for Use by the Amateur )  
Radio Service )ET Docket No. 93-40  
RM-7747REPLY COMMENTS

Paging Systems, Inc. ("Paging"), by its attorneys, hereby submits its Reply Comments in connection with the Notice of Proposed Rule Making in the above-referenced proceeding.

Paging is one of the three licensees authorized in the Automated Maritime Telecommunications System (AMTS). Paging holds AMTS licenses to serve the Pacific Coast of the United States.

Although Paging is sympathetic to Amateur Radio Service users, it supports the Comments filed on June 14, 1993 by Fred W. Daniel (Daniel) d/b/a Orion Telecom in this proceeding, in the interest of reliability and safety in the AMTS service.

When the Commission amended its Rules to permit AMTS operations in the 216-220 MHz band on a nationwide basis, it stated that it wanted to move forward to expand this service, to bring modern communications services to the

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maritime user community outside of the inland waterways network. First Report and Order, 6 FCC 2nd 437, 439 (1991). It described such enhancements such as direct-dial telephony service to vessels for voice, data and facsimile communications as well as vessel tracking and locations, to become available to the maritime community.

More importantly, however, it stressed continuity of service in the AMTS, stating that the complaints about inadequacy of conventional VHF public coast stations and the inconvenience of dealing with a series of individual stations had led to creation of AMTS. Supra at 440. By implication then, an AMTS licensee is required to cover its service area reliably and with continuity, to avoid the past problems with gaps and quality in service, which the Commission had stressed should be avoided. Thus, the AMTS licensee must provide the same reliable service expected from any telephone company. Interference from Amateur use would disrupt this reliability and could raise critical, life threatening safety problems with the AMTS user. Accordingly, Paging submits that such Amateur use would not be in the public interest.

In Paging's Pacific Coast operation, for example, because of mountainous terrain, line of sight coverage between stations can reach in excess of 100 miles. Any amateur use between stations could cause discontinuous coverage to AMTS users, a situation that the Commission was

trying to avoid when it amended its Rules to permit AMTS operations nationwide.

Paging submits that there may be some areas in the country in which Amateur Use in the 219-220 MHz Band would be acceptable. As long as there are zones of protection of at least 575 miles along both Coasts and the Mississippi River, Paging does not oppose allowing Amateur use in the 219-220 MHz Band in certain specified regions; however, it opposes any Amateur use that interferes with the provision

CERTIFICATE OF SERVICE

I, Linda H. Aguirre, do hereby certify that on this 15th day of July, 1993, the foregoing **REPLY COMMENTS** was served to the following persons by First Class Mail:

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